

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

VALORES MUNDIALES, S.L. and  
CONSORCIO ANDINO, S.L.

Plaintiffs,  
v.  
BOLIVARIAN REPUBLIC OF VENEZUELA,  
Defendant.

C.A. No.: 1:23-mc-00298-LPS

**DECLARATION OF STEPHEN C. CHILDS**

I, STEPHEN C. CHILDS, hereby declare under penalty of perjury, pursuant to 28 U.S.C. § 1746, that the following facts are true and correct to the best of my knowledge, information, and belief:

1. I am an attorney of the law firm Abrams & Bayliss LLP, counsel to the defendant Bolivarian Republic of Venezuela (the “Republic”) in the above-captioned case.

2. I respectfully submit this declaration in further support of the Brief of Bolivarian Republic of Venezuela in Opposition to Plaintiffs and Judgment Creditors Valores Mundiales, S.L. and Consorcio Andino, S.L.’s Motion for an Order Authorizing the Issuance of a Writ of Attachment *Fieri Facias* Pursuant to 28 U.S.C. § 1610(c).

3. Attached as Exhibit 1 is a copy of the Statement of Issues to be Raised filed on July 21, 2023 in *Valores Mundiales, S.L., et al. v. Bolivarian Republic of Venezuela*, No. 23-7077 (D.C. Cir.).

4. Attached as Exhibit 2 is a copy of the Opening Brief of the Bolivarian Republic of Venezuela filed on May 17, 2023 in *OI European Group, B.V. v. Bolivarian Republic of Venezuela*, Nos. 23-1647, 23-1781 (3<sup>rd</sup>. Cir.).

5. Attached as Exhibit 3 is a copy of the Brief for Intervenor-Appellant (Petróleos de Venezuela, S.A.) and Joint Appendix Volume I of XVI filed on May 17, 2023 in *OI European Group, B.V. v. Bolivarian Republic of Venezuela*, Nos. 23-1647, 23-1648, 23-1649, 23-1650, 23-1651, 23-1652, 23-1781 (3<sup>rd</sup>. Cir.).

6. Attached as Exhibit 4 is a copy of the Brief of the Venezuela Parties Regarding the Inclusion of Additional Judgments in the Sale Process and the Issuance of Unconditional Orders of Attachment filed on May 24, 2023 in *Crystallex Int'l Corp. v. Bolivarian Republic of Venezuela*, C.A. No. 17-mc-00151-LPS (D. Del.).

7. Attached as Exhibit 5 is a copy of the Answering Brief of the Venezuela Parties Regarding the Inclusion of Additional Judgments in the Sale Process and the Issuance of Unconditional Orders of Attachment filed on June 7, 2023 in *Crystallex Int'l Corp. v. Bolivarian Republic of Venezuela*, C.A. No. 17-mc-00151-LPS (D. Del.).

8. Attached as Exhibit 6 is a copy of the Reply Brief of the Venezuela Parties Regarding the Inclusion of Additional Judgments in the Sale Process and the Issuance of Unconditional Orders of Attachment filed on June 14, 2023 in *Crystallex Int'l Corp. v. Bolivarian Republic of Venezuela*, C.A. No. 17-mc-00151-LPS (D. Del.).

Dated: Wilmington, Delaware  
July 24, 2023

/s/ Stephen C. Childs  
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